

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA**

IN RE:	Chapter 11
BDC Group Inc.,	Bankruptcy No. 23-00484
Debtor-in-Possession.	MOTION TO SET BAR DATE FOR NON-GOVERNMENTAL UNITS AFFECTED BY AMENDED SCHEDULES TO FILE A PROOF OF CLAIM

COMES NOW the Debtor-in-Possession, BDC Group Inc., through its undersigned counsel, and hereby respectfully requests this Court set a bar date for non-governmental units affected by the amended schedules to file a Proof of Claim, stating the following in support:

1. The Debtor-in-Possession filed its Chapter 11 bankruptcy on June 13, 2023.
2. On June 27, 2023, Debtor filed its original Summary of Assets and Liabilities, Statement of Financial Affairs, and Schedules A/B, D, E/F, G, and H (Doc. 76).
3. On July 7, 2023, Debtor filed amendments to its Summary of Assets and Liabilities, Statement of Financial Affairs, and Schedules A/B, D, E/F, G, and H (Doc. 118).
4. On October 12, 2023, Debtor filed additional amendments to its Summary of Assets and Liabilities, Statement of Financial Affairs, and Schedules A/B, D, E/F, G, and H (Doc. 235) ("Amended Schedules").
5. The initial bar date for non-governmental units to file Proofs of Claim passed on August 22, 2023.
6. Since these amendments may have affected the treatment of various creditors' claims, Debtor requests that this Court set a new bar date for non-governmental units affected by these amendments to file a Proof of Claim.
7. Debtor will promptly serve a copy of the Amended Schedules, and a Notice of Schedule Amendments that advises creditors of the new deadline for affected creditors to file a Proof of Claim, on the entire mailing matrix.
8. Debtor will also file its Chapter 11 Reorganization Plan ("Plan") on no later than October 17, 2023.

9. Debtor requests that the new bar date for non-governmental units to file a Proof of Claim be set for October 31, 2023, so that all Proofs of Claims are submitted before the objection period on the Plan expires.
10. Counsel for the Debtor-in-Possession has not spoken with the Office of the United States Trustee and does not know its position on this motion.
11. Counsel for the Debtor-in-Possession has not spoken with counsel for the Unsecured Creditors Committee regarding this motion and does not know its position on this motion.

WHEREFORE the Debtor-in-Possession respectfully requests this Court set a bar date of October 31, 2023 for non-governmental units affected by the amendments to file a Proof of Claim, and grant such other relief as is just and equitable given the circumstances.

Dated this 17th day of October, 2023.

Respectfully submitted,

AG & BUSINESS LEGAL STRATEGIES

/s/ Joseph A. Peiffer

Joseph A. Peiffer AT0006160

P.O. Box 11425

Cedar Rapids, Iowa 52410-1425

Telephone: (319) 363-1641

Fax: (319) 200-2059

Email: joe@ablsonline.com

ATTORNEY FOR DEBTOR-IN-POSSESSION

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 17th day of October, 2023, a copy of the foregoing document was filed with the Clerk of Court for the United States Bankruptcy Court for the Northern District of Iowa using the CM/ECF system, and served electronically on those participants that receive service through the CM/ECF system.

Signed: /s/ Leah M. Watson